

## REMARKS

Claims 33-60 remain in the present application. Claims 33, 35, 37, 39, 41, 43, 45, 47, 49, 51, 53, 56 and 58 are amended herein. Applicants respectfully assert that no new matter has been added as a result of the claim amendments. Applicants respectfully request further examination and reconsideration of the rejections based on the arguments set forth below.

### Claim Rejections – 35 U.S.C. §103

Claims 33-60 are rejected in the present Office Action under 35 U.S.C. §103(a) as being unpatentable over United States Patent Application Publication Number 2004/0048503 by Mills et al. (hereafter referred to as "Mills") in view of United States Patent Number 6,442,570 to Wu (hereafter referred to as "Wu"). Applicants have reviewed the cited references and respectfully submit that the embodiments of the present invention as recited in Claims 1-3 and 17-18 are not rendered obvious by Mills in view of Wu for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 33 that recites a method of copying files comprises (emphasis added):

storing a plurality of location identifiers comprising a location identifier of a removable memory, said removable memory detachably coupled to a portable electronic device;  
in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file; and  
in response to said associating, automatically copying said file to said removable memory.

Independent Claims 39, 45, 51 and 56 recite limitations similar to independent Claim 33. Claims 34-38, 40-44, 46-50, 52-55 and 57-60 depend from their respective independent Claims and recite further limitations to the claimed invention.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of "in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33. As recited and described in the present application, in response to a user selection of a file to copy to a removable memory, a location identifier of the removable memory is associated with the file.

In contrast to the claimed embodiments, Applicants understand Mills to teach merely that digitally encoded media is stored to a removable memory (paragraph 46). However, Applicants respectfully submit that mere storing of information on a removable memory does not amount to associating a location identifier of a removable memory with a file as claimed. Further, Applicants respectfully submit that a mere storing of information does not amount to associating a location identifier of a removable memory with a file *in response to a user selection of the file to copy to the removable memory* as claimed. As such, Applicants reiterate that Mills fails to teach or suggest the limitations of "in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33.

Moreover, page 3 of the rejection states that "Mills does not disclose any human intervene [sic] in the copying process." Thus, as acknowledged by the rejection, Applicants again reiterate that Mills fails to teach or suggest the limitations of "in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33.

Further, page 3 of the rejection poses the question: "if 'associating a location identifier of a removable memory with a file' does not exist in Mills, how does the computer know where to copy or store?" In response, although it is Applicants' duty to point out the distinctions between the cited references and the claimed invention in accordance with MPEP §714.02, Applicants have no obligation to provide examples of how the invention taught by the reference may be implemented. In this case, Applicants have pointed out that Mills fails to teach or suggest the limitations of "in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33, and also that the mere teaching of storing media on a removable memory as taught by Mills does not amount to associating a location identifier of a removable memory with a file in response to a user selection of a file to copy to the removable memory as claimed. If the Examiner cannot show where in the Mills reference these claim limitations are taught, Applicants respectfully request that the Examiner withdraw the rejection in the next Office Action.

Applicants respectfully assert that Wu, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed above with respect to independent Claim 33. Specifically, Applicants respectfully assert that Wu also fails to teach or suggest the limitations of "in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33.

In contrast to the claimed embodiments, Applicants understand Wu to teach volume identifiers and object identifiers, each of which is not a location identifier as claimed. For example, Wu teaches that a volume identifier identifies

a specific storage volume by name (col. 5, lines 17-23) instead of a location identifier which identifies the location of a file as claimed. Additionally, Wu teaches that an object identifier identifies an object *without regard to the location of the object*. For example, Wu teaches that the same file in two different locations may have the same object identifier (col. 5, lines 36-38). Therefore, Applicants reiterate that that Wu also fails to teach or suggest the limitations of "in response to a user selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33.

Applicants respectfully assert that Mills fails to teach or suggest the limitations of "storing a plurality of location identifiers comprising a location identifier of a removable memory" as recited in independent Claim 33. Additionally, Applicants respectfully assert that Wu, either alone or in combination with Mills, also fails to teach or suggest the limitations of "displaying a plurality of location identifiers comprising a location identifier of a removable memory" as recited in independent Claim 33. As recited and described in the present application, a plurality of location identifiers comprising a location identifier of a removable memory are displayed.

In contrast to the claimed embodiments, Applicants fail to find any teaching or suggestion in Wu of a location identifier as discussed above. Further, Applicants fail to find any teaching or suggestion in Wu of such a location identifier which is stored as claimed. Accordingly, Applicants reiterate that Wu fails to teach or suggest the limitations of "storing a plurality of location identifiers comprising a location identifier of a removable memory" as recited in independent Claim 33.

Additionally, page 2 of the Office Action mailed June 4, 2007 states that Mills fails to teach or suggest the limitations of "displaying said plurality of location identifiers on a display of said portable electronic device" as recited in Claim 35, and similarly recited in Claims 41, 47, 53 and 58. Applicants concur.

Applicants respectfully assert that Wu, either alone or in combination with Mills, also fails to teach or suggest the limitations of "displaying said plurality of location identifiers on a display of said portable electronic device" as recited in Claim 35, and similarly recited in Claims 41, 47, 53 and 58. As recited and described in the present application, a plurality of location identifiers are displayed on a display of a portable electronic device.

In contrast to the claimed embodiments, Applicants fail to find any teaching or suggestion in Wu of location identifiers as claimed, as discussed above. Further, Applicants fail to find any teaching or suggestion in Wu of the display of such location identifiers as claimed.

Page 3 of the rejection states that Wu teaches a mapping table for correlating object identifiers (col. 5, lines 33-34). However, even assuming arguendo that object identifiers as taught by Wu are analogous to location identifiers as claimed, Applicants fail to find any teaching or suggestion that the object identifiers as taught by Wu are displayed similar to the display of location identifiers as claimed. Accordingly, Applicants reiterate that Wu, either alone or in combination with Mills, also fails to teach or suggest the limitations of "displaying said plurality of location identifiers on a display of said portable electronic device" as recited in Claim 35, and similarly recited in Claims 41, 47, 53 and 58.

Page 3 of the rejection also states that Wu teaches an LCD (Figure 3). However, even assuming arguendo that object identifiers as taught by Wu are analogous to location identifiers as claimed, Applicants respectfully submit that a mere teaching of a display by Wu does not amount to teaching a display of the object identifiers similar to the display of location identifiers as claimed. Accordingly, Applicants reiterate that Wu, either alone or in combination with Mills, also fails to teach or suggest the limitations of "displaying said plurality of location identifiers on a display of said portable electronic device" as recited in Claim 35, and similarly recited in Claims 41, 47, 53 and 58.

For these reasons, Applicants respectfully submit that independent Claim 33 is not rendered obvious by Mills in view of Wu, thereby overcoming the 35 U.S.C. §103(a) rejection of record. Since independent Claims 39, 45, 51 and 56 recite limitations similar to those discussed above with respect to independent Claim 33, independent Claims 39, 45, 51 and 56 also overcome the 35 U.S.C. §103(a) rejections of record. Since dependent Claims 34-38, 40-44, 46-50, 52-55 and 57-60 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 34-38, 40-44, 46-50, 52-55 and 57-60 are also not rendered obvious by Mills in view of Wu. Therefore, Claims 33-60 are allowable.

### CONCLUSION

Applicants respectfully assert that Claims 33-60 are in condition for allowance and Applicants earnestly solicit such action from the Examiner.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 50-4160.

Respectfully submitted,

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